July 29, 2011

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street NW
Washington, DC 20554

Re: Comment Deadlines Established Regarding the LightSquared Technical Working Group Report, IB Docket No. 11-109

Dear Ms. Dortch:

I am writing to express my strongest possible opposition to LightSquared's request to proceed with deployment of its terrestrial network of base stations as offered in response to the Technical Working Group Report of June 30, 2011. However, I do not wish to add dialogue to the extensive body of technical issues that have been brought forward in several official interagency and corporate communications, but rather offer opposition based on some practical insights derived from three life experiences:

Senior Emergency Preparedness Liaison Officer (EPLO) deployed to the Pentagon during Hurricanes Katrina, Ophelia, Rita and Wilma. In that capacity, I came have in-depth understanding that a lack of geospatial capability among emergency responders significantly hampered our nation's ability to effectively deal with this type of disaster. It's a point that reverberates throughout the reports that were completed in the aftermath of the 2005 hurricane season, to include those issued by the White House, Congress, Department of Defense, and most notably, the National Academies of Sciences – *Successful Response Starts With a Map*. Indeed, the most basic theme throughout those reports is that without "Where", there is no response. And to be certain, when landmarks are gone, street signs are missing, cell towers have collapsed, and familiar territory is filled with debris that removes normal location reference – the only "Where" that will effectively work is GPS. Consequently, in the disaster response realm, there simply is no acceptable level of degradation to the GPS signal.

Airline pilot for the past 23 years. Again the issue of life and death is at the fore-front. As you are probably well aware, the Federal Aviation Administration (FAA) requires that prior to push back of a commercial aircraft, all passenger electronic devices must be turned off. The reason for that restriction is that "spill over" electronic signals from items as simple as the battery powered Nintendo Game Boy have been shown to interfere with aircraft communication and navigation systems. Since the time that restriction was first put in place by the FAA more than 15 years ago, precision GPS navigation systems have been added to most commercial, civilian and military aircraft. In addition, precision instrument landing approaches based solely on the use of the GPS signal have been implemented. By approving LightSquared's request to proceed, the FCC would be effectively saying that while electronic interference from a low power Game Boy is a flight safety issue, the demonstrated high powered LightSquared signal interference to GPS is not. I sincerely do not believe any one of the 393 "souls onboard" my aircraft this evening would agree with that premise.

Executive Director of SharedGeo, a Minnesota nonprofit whose mission includes bringing advancements in geospatial technologies to the emergency services sector. As you are well aware from executing the FCC mission, 9-1-1 systems must be able to geospatial locate a caller in order to

facilitate dispatch of emergency services personnel. Indeed, since this is a life and death issue, communities spend millions of dollars to reduce response times by working to improve the quality of the geospatial data in their systems, and to get those systems to correctly identify the appropriate response vehicle (usually closest). However, dispatch is only 50% of the equation; the other 50% is the ability of the emergency response crew to correctly navigate to the location where help is needed. And with each passing day, map books are fading in importance in this role and use of onboard GPS navigation systems is becoming the norm. Furthermore, since nearly 34% of dispatches in the U.S. are sent to locations without an address – GPS is by far the most effective way to respond to those types of calls. Similarly, Search And Rescue (SAR) teams looking for lost individuals must have access to an accurate GPS signal to ensure a proper search pattern is being used. Consequently, in my opinion, the potential that LightSquared could negatively impact the accuracy of a GPS signal in these types of situations, is simply not worth the Internet surfing capability the nation will gain.

Finally, I wish to comment on the approach the FCC has used with respect to this issue. When consideration is given to the many years of research and 10's of billions of dollars the tax payers have expended to create our nation's current GPS capabilities, this entire process has the aura of a politically motivated rush to judgment. While the letter of the law has been met, the spirit has not. On a matter of this degree of importance, one that could potentially impact every citizen of this nation, where was the public outreach? Why have standards for review been hurried? And why was the 30 day comment period offered during the height of the summer vacation season? These issues leave me wondering about the motivations of the FCC, and whether or not Wall Street is once again thumbing its nose at the American people.

In summary, for the reasons above and the many technical issues raised by the likes of the Department of Defense, FAA, Air Line Pilots Union, John Deere, and many, many others, so long as LightSquared retains its currently allocated frequency band, I am adamantly opposed to them proceeding with further deployment of their system despite their assurances as stated in the FCC request for comments, to:

> (1) operate at lower power than permitted by its existing FCC authorization;
> (2) agree to a "standstill" in the terrestrial use of its Upper 10 MHz frequencies immediately adjacent to the GPS band; and
> (3) commence terrestrial commercial operations only on the lower 10 MHz portion of its spectrum and to coordinate and share the cost of underwriting a workable solution for the small number of legacy precision measurement devices that may be at risk.

Accepting these terms is opening the door on technical disaster. Instead, before LightSquared can proceed in any form whatsoever, the FCC should require LightSquared to provide irrefutable scientific proof that the design and deployment of its system will not damage any part of the nation's GPS capabilities.

Yours truly,

Stephen D. Swazee, Sr.
CAPT, USN (Ret.)

cc: Congressman John Kline